

BRAFMAN & ASSOCIATES, P.C.

ATTORNEYS AT LAW

767 THIRD AVENUE, 26TH FLOOR
NEW YORK, NEW YORK 10017
TELEPHONE: (212) 750-7800
FACSIMILE: (212) 750-3906
E-MAIL: ATTORNEYS@BRAFLAW.COM

BENJAMIN BRAFMAN

MARK M. BAKER
OF COUNSEL

MARC A. AGNIFILO
OF COUNSEL

ZACH INTRATER
OF COUNSEL

ANDREA L. ZELLAN
JOSHUA D. KIRSHNER
JACOB KAPLAN
TENY R. GERAGOS
ADMITTED IN NY & CA
STUART GOLD

October 15, 2020

VIA ECF

The Honorable Margo K. Brodie
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Ng Chong Hwa a.k.a Roger Ng, 18 Cr. 538 (MKB)

Dear Judge Brodie:

We represent Roger Ng in the above-captioned case and write with the consent with the government to propose a brief adjournment of the previously-ordered motion schedule. (See 10/1/2020 Order.) At the October 6, 2020 status conference, the parties informed the Court that we have been in contact with one another regarding a Letter for Particulars that we sent to the Government. Since the conference, we have engaged in substantive discussions with the government regarding Mr. Ng's Letter for Particulars that may obviate the need for a lengthy Bill of Particulars motion.

The parties have conferred and propose the following briefing schedule for the dispositive and discovery motion deadlines:

10/30 – Defense Motions Due
12/4 – Government Opposition Due
12/14 – Defense Reply Due

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We thank the Court for its attention to this matter.

Respectfully submitted,



Marc A. Agnifilo, Esq., *Of Counsel*

Zach Intrater, Esq., *Of Counsel*

Teny R. Geragos, Esq.

Jacob Kaplan, Esq.

cc: Counsel for the Government (via ECF)